

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

MAR 30 2015

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David J. Bradley, Clerk of Court

United States of America)
)
 V.) Case No. B-15-296-MJ
)
Ruben SOSA)
 Defendant(s))

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/27/2015 in Cameron County, in the Southern District of Texas, the defendant violated:

Code Section

Title 22, United States Code, Section(s) 2778 .

Offense Description

Knowingly and willfully conspire to attempt to export and /or cause to be exported into the United Mexican States from the United States of America a defense article, to wit: Roni G-2 pistol to carbine conversion kits, which were designated as defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export.

This criminal complaint is based on these facts:

On February 12, 2015, Homeland Security Investigations, received information stating Ruben SOSA placed an order for 50 Roni G-2 pistol to carbine conversion kits to be delivered to Brownsville, Texas. The Roni G-2 kit is an item under the control of the Dept. of State and is therefore a defense-related article on the United States Munitions List (USML).

On March 27, 2015, Ruben SOSA applied for entry in the U.S. from MX via the Brownsville and Matamoros International Bridge in Brownsville, TX. SOSA was detained and subsequently interviewed by special agents. During interview SOSA was asked regarding his purchase of 50 Roni G-2 pistol to carbine conversion kits. SOSA stated he did purchase the Roni kits and subsequently did export the 50 Roni G-2 kits to Mexico. SOSA claimed knowledge that a license from the Dept. of State was required to export such items and that exporting such items without a license was illegal. SOSA stated he did not possess nor has ever applied for an export license from the Dept. of State.



Complainant's Signature

Edgar Figueroa Special Agent

Printed name and title



Judge's Signature

Ignacio Torteya, III U.S. Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

March 30, 2015

Date

Brownsville, Texas

City and State